

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MEREDITH ELIZALDE, individually
and as Administratrix of **the Estate of**
NICOLAS ELIZALDE, a minor, deceased
219 Gerald Drive
Aston, PA 19014

CIVIL ACTION NO: 2:24-cv-4494

Plaintiff,

v.

THE SCHOOL DISTRICT OF
PHILADELPHIA
440 N. Broad Street, Philadelphia, PA
Philadelphia, PA 19130;

Defendant.

**STIPULATION TO EXTEND TIME TO FILE RESPONSE
TO DEFENDANT'S 12(B)(6) MOTION**

Plaintiff Meredith Elizalde, individually and as Administratrix of the Estate of Nicolas Elizalde, by and through counsel, respectfully requests the Court's approval of the following stipulation:

1. Plaintiff filed this action on August 27, 2024.
2. Defendant The School District of Philadelphia filed a motion to dismiss Plaintiff's Complaint pursuant to Federal Rule of Procedure 12(b)(6).
3. Plaintiff's counsel and defense counsel filed a stipulation to extend the response date to January 13, 2025, and this Court approved the extension.
4. Plaintiff's counsel has corresponded with counsel for the Defendant, Jeffrey M. Scott, who has consented to an additional fourteen (14) days for Plaintiff to file her answer.
5. Plaintiff will file her response to Defendant's motion on or before January 27, 2025.

KLINE & SPECTER, PC

BY: /s/ Kimberly M. Collins
Kimberly M. Collins
1525 Locust Street, 19th Floor
Philadelphia, PA 19102
(215) 772-1000
(215) 792-5523 Fax
Attorneys for Plaintiff

ARCHER & GREINER, PC

BY: /s/ Jeffrey M. Scott
Jeffrey M. Scott
Three Logan Square, Suite 3500
1515 Arch Street, 14th Floor
Philadelphia, PA 19103
(215) 683-5114
Attorneys for Defendant

DATED: January 9, 2025

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Approved By: /s/ Mitchell S. Goldberg
GOLDBERG, J.